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6 *Attorneys for Defendants*  
 7 *Renee Baker, Francisco Bautista, James Dzurenda,*  
*James Donnelly, Ray East, Shari Kassebaum,*  
 8 *Ramon Olivas, Scott Steinheimer, and Roger Terance*

9 UNITED STATES DISTRICT COURT  
 10 DISTRICT OF NEVADA

11 CHIOKE GADSDEN,

12 Plaintiff,

13 vs.

14 SHARI KASSEBAUM, et al.,

15 Defendants.

Case No. 3:17-cv-00728-MMD-CLB

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO COMPLETE  
 LIMITED DISCOVERY**

16 Defendants, Renee Baker, Francisco Bautista, James Dzurenda, Ray East, James Donnelly, Shari  
 17 Kassebaum, Ramon Olivas, Scott Steinmeimer, and Roger Terance, by and through counsel, Aaron D.  
 18 Ford, Attorney General of the State of Nevada, and Mary Anne Martin, Deputy Attorney General, hereby  
 19 stipulate and agree that the time for discovery should be extended by fifty days to May 29, 2020.

20 The purpose of the Stipulation is to allow Plaintiff additional time to propound one request for  
 21 production of documents (RFPD) upon a single Defendant. The original discovery deadline in this case  
 22 was September 9, 2019. ECF No. 20. The discovery deadline was extended to April 9, 2020 by this  
 23 Court's Order (ECF No. 30). To date, there has been no discovery propounded upon Plaintiff;  
 24 Defendants have responded to multiple discovery requests.

25 On February 18, 2020, Plaintiff improperly propounded an RFPD upon "Defendants," which  
 26 was returned to Plaintiff on March 20, 2020 for lacking a certificate of service and not being addressed  
 27 to a party. ECF No. 34 at 9. Deputy Attorney General (DAG) Martin was new to the Office of the  
 28 Attorney General (OAG) at the time Plaintiff's RFPD was received in February 2020, and accepts

responsibility for the fact that Plaintiff's RFPD should have been more promptly rejected and returned to Plaintiff so that he could timely propound the RFPD upon a particular Defendant.

On March 23, 2020 Plaintiff filed a Motion to Extend Discovery (Second Request) Video-Conference Hearing Requested. ECF No. 34. On Friday, April 3, 2020 DAG Martin called Plaintiff Gadsen at the Lovelock Correctional Center to attempt to resolve the discovery dispute through a "meet and confer." In light of the OAG's delay in returning the February 18, 2020 RFPD to Plaintiff, the parties agree that good cause exists for additional time for limited discovery. Namely, Plaintiff has agreed to respond to one set of discovery requests (either requests for admissions, interrogatories, or RFPD) propounded on him. In exchange, one Defendant of Plaintiff's choosing will respond to Plaintiff's February 18, 2020 RFPD when Plaintiff properly serves such Defendant with the RFPD. DAG Martin has instructed Plaintiff to include a certificate of service with the RFPD when he propounds it upon one named Defendant and confirmed that Plaintiff is currently in receipt of the returned RFPD.

Therefore, the parties stipulate and request an additional fifty days to complete the limited discovery described above. The new discovery cut-off would be May 29, 2020.

DATED this 6 day of April, 2020.

DATED this 6 day of April, 2020.

AARON D. FORD  
Attorney General

By: 

Chioke Gadsen # 56736  
Plaintiff, *Pro*

By: 

MARY ANNE MARTIN, Bar No. 13267  
Deputy Attorney General

*Attorneys for Defendants*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: April 6, 2020

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 6th day of April, 2020, I caused to be served a copy of the foregoing, **STIPULATION AND ORDER FOR EXTENSION OF TIME TO COMPLETE LIMITED DISCOVERY**, by U.S. District Court CM/ECF Electronic Filing to:

Chioke Gadsden #56736  
Care of LCC Law Librarian  
Lovelock Correctional Center  
1200 Prison Road  
Lovelock, Nevada 89419  
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/s/Perla M. Hernandez  
An employee of the Office  
of the Attorney General